

From: [Ailis Gregory \[US\]](#)
To: [Herrick, Jacquelyn](#)
Subject: RE: 42750 Lambda-cyhalothrin products renegotiation needed
Date: Wednesday, September 02, 2020 2:36:17 PM
Attachments: [042750-GTE.20200904 LambdaCy Tech 51258501 Stability.pdf](#)
[042750-GTE.20200902 Lambda Cyhalothrin Tech 8570-35 internal.pdf](#)

Hi Jackie.

Please find attached revised data matrix dated today in addition to a waiver request. I did also update the data submitters from the most recent list.

Additionally, I agree to a one month PRIA renegotiation for both 42750-GTE D#551655 and 42750-GTG D#551651, making the new PRIA date 10/2/2020.

Thanks so much for your help on these!

Ailis

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Wednesday, September 2, 2020 1:49 PM
To: Ailis Gregory [US] <ailisg@albaughllc.com>
Subject: RE: 42750 Lambda-cyhalothrin products renegotiation needed

Hi Ailis,

Yes, please provide an official justification/waiver request and adjust the data matrix and that should be enough. Please make sure the data matrix has a new date. Can you also, agree to a one month renegotiation (42750-GTE D#551655, 42750-GTG D#551651) to give a little extra time to cover all of the loose ends so we are not scrambling for tomorrow? New date would be 10/2.

Thanks,
Jackie

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From: Ailis Gregory [US] <ailisg@albaughllc.com>
Sent: Wednesday, September 02, 2020 1:34 PM
To: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Subject: RE: 42750 Lambda-cyhalothrin products renegotiation needed

Hi Jackie.

I'm sorry to hear you were sick, and I know you are short on reviewers. I'm sorry the situation is so difficult.

Regarding guideline 830.6313, the exposure to metal and metal ions is not applicable since the product is only packaged in polyethylene or fiber drums. I will prepare a revised matrix to reflect this. Would that be acceptable?

Ailis

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Wednesday, September 2, 2020 1:23 PM
To: Ailis Gregory [US] <ailisg@albaughllc.com>
Subject: RE: 42750 Lambda-cyhalothrin products renegotiation needed

Hi Ailis,

My apologies for just circling back here. I was quite sick last week, and as you know I am short on reviewers so have been having to handle a lot of the day to day details on many of these applications. With that in mind, since I last emailed you, the PC review has been completed (when we are approaching the PRIA date and there is still no review, we are advised to request a blanket 3 month renegotiation). As you can see, there is still a deficiency in guideline 830.6313 that needs to be addressed. As the PRIA date is tomorrow, we don't have a path forward without fully satisfying this guideline. My request for a 3 month renegotiation (from the date you can submit the fix still stands). Please note if I don't hear from you this afternoon, I will follow up with a 75 day deficiency letter.

Please let me know if you have any questions.

Thanks,
Jackie

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From: Ailis Gregory [US] <ailisg@albaughllc.com>
Sent: Friday, August 28, 2020 10:04 AM
To: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Subject: RE: 42750 Lambda-cyhalothrin products renegotiation needed

Hi Jackie.

This is really bad news for us. Pushing back until December will cause us and our customers to lose ability to launch this in 2021 as we had committed to do. This product is very important for Albaugh and our customers. We have already given a large extension of 150 days for the additional resubmission in June. Another 90 now will push this to 240 days. This does not seem fair to us. Is there anything can be done to avoid the extension? Or is there some other action we can set aside for now to keep this one on schedule?

Let me know your thoughts.

Ailis

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Friday, August 28, 2020 9:05 AM
To: Ailis Gregory [US] <ailisg@albaughllc.com>
Subject: 42750 Lambda-cyhalothrin products renegotiation needed

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Hi Ailis,

I would like to request a 90 day renegotiation for the following products to give extra time for the product chemistry review needed to address the deficiencies of the first review. The new PRIA date would be 12/3/20. Please respond with your concurrence or any concerns.

42750-GTG (D# 551651)
42750-GTE (D#551655)

Thank you,
Jackie

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